IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
)	
THEODORE BUNYEN WILKERSON JR)	Case No. 15-31131-KRH
DELPHINE GREEN WILKERSON)	Chapter 13
)	-
Debtors)	

SECOND MOTION FOR EXTENSION OF TIME FOR FILING CERTIFICATE OF COMPLETION OF POST-PETITION FINANCIAL MANAGEMENT COURSE AND CERTIFICATION PURSUANT TO 11 U.S.C. § 1328

COME NOW the Debtors, by counsel, and file this Second Motion to extend the time for the filing of the Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328; and in support hereof state unto the Court as follows:

- 1. The Debtors filed the Chapter 13 petition herein on March 4, 2015.
- 2. The Debtors have completed the Chapter 13 Plan payments and on or about April 17, 2020 the Court issued a Notice to Debtors and Creditors Concerning Issuance of Discharge.
- 3. Counsel for the Debtors has had difficulty in contacting the Debtors to remind the Debtor of the requirement to complete the Post-Petition Financial Management Course and sign the Certification Pursuant to 11 U.S.C. § 1328. Counsel was successful in contacting the son of the Debtors, but he was unable to provide counsel with the necessary contact information.

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508 Richmond, VA 23218 (804) 225-9500 (phone) (804) 225-9598 (fax) jkane@kaneandpapa.com Counsel for Debtors Case 15-31131-KRH Doc 63 Filed 06/18/20 Entered 06/18/20 16:56:18 Desc Main Document Page 2 of 7

4. Although the Court granted the Debtors' first Motion for Extension of Time on

this matter on June 17, 2020, the extension date set forth in the Order was June 15, 2020, two

days before the Order was entered, thus preventing counsel from timely filing a request for a

second extension.

WHEREFORE, the Debtors respectfully request that the Court enter an Order extending

the time for the filing of the Debtors' Certificate of Completion of Post-Petition Financial

Management Course and Certification Pursuant to 11 U.S.C. § 1328, and for such other relief as

the Court may deem appropriate.

Respectfully submitted,

THEODORE BUNYEN WILKERSON JR **DELPHINE GREEN WILKERSON**

By: /s/ James E. Kane

Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508

Richmond, VA 23218

(804) 225-9500 (phone)

(804) 225-9598 (fax)

jkane@kaneandpapa.com

Counsel for Debtors

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane James E. Kane

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
THEODORE BUNYEN WILKERSON JR DELPHINE GREEN WILKERSON)	Case No. 15–31131–KRH Chapter 13
Debtors)	

NOTICE OF MOTION AND HEARING

The above Debtors have filed a Second Motion to extend the time for the filing of the Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

• File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will <u>receive</u> it on or before the date stated above, to:

Clerk of Court United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire Kane & Papa, P.C. 1313 East Cary Street Richmond, Virginia 23219 Case 15-31131-KRH Doc 63 Filed 06/18/20 Entered 06/18/20 16:56:18 Desc Main Document Page 5 of 7

• Attend a hearing scheduled for July 15, 2020 at 12:00 p.m. at 701 E. Broad Street, Room 5000, Richmond, VA. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

THEODORE BUNYEN WILKERSON JR DELPHINE GREEN WILKERSON

By: /s/ James E. Kane Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508 Richmond, VA 23218 (804) 225-9500 (phone) (804) 225-9598 (fax) jkane@kaneandpapa.com Counsel for Debtors

CERTIFICATE OF SERVICE

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/s/ James E. Kane
James E. Kane

Case 15-31131-KRH Doc 63 Filed 06/18/20 Entered 06/18/20 16:56:18 Desc Main Label Matrix for local noticing United States Barkruptcy Parts 6 of 7 ATET Mobility II LLC 0422-3 Case 15-31131-KRH Eastern District of Virginia Richmond Mon Apr 30 14:59:44 EDT 2018

PO Box 590067 Fort Lauderdale, FL 33359-0067

BCC Financial

CAC Financial Corp. 2601 NW Expressway Oklahoma City, OK 73112-7236

P.O. Box 740776 Cincinnati, OH 45274-0776

Capital City

Comenity Bank/Inbryant Po Box 182789 Columbus, OH 43218-2789

Flagstar Bank Attn: Bankruptcy Dept 5151 Corporate Dr Troy, MI 48098-2639

Fst Premier 3820 N Louise Ave Sioux Falls, SD 57107-0145

(p) HORIZON FINANCIAL MANAGEMENT LLC 9980 GEORGIA ST CROWN POINT IN 46307-6520

Lab Corp. PO Box 2240 Burlington, NC 27216-2240

Parrish & Lebar 5 East Franklin Street Richmond, VA 23219-2105 United States Healt uptcy Paye 6 of 7 701 East Broad Street Richmond, VA 23219-1888

Baiko Pathology 6240 Shiloh Road Alpharetta, GA 30005-8347

CFM PO BOX 740776 Cincinnati, OH 45274-0776

Cardiolabs Inc. 357 Riverside Drive STE 1000 Franklin, TN 37064-5451

Commonwealth of Virginia Department of Taxation P.O. Box 2156 Richmond, VA 23218-2156

(p) FLAGSTAR BANK FSB 5151 CORPORATE DRIVE MAIL STOP E 115 3 TROY MI 48098-2639

Heart Specialist of Richmond 505 W Leigh Street, Ste 205 Richmond, VA 23220-3239

(p) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346

Memorial Regional Medical Cent P.O. Box 33130 Phoenix, AZ 85067-3130

Planet Home Lending, LLC c/o BWW Law Group, LLC 8100 Three Chopt Rd., Suite 240 Richmond, VA 23229-4833

% AT&T Services, Inc Karen Cavagnaro, Paralegal One AT&T Way, Room 3A104 Bedminster, NJ 07921-2693

Bon Secours P.O. Box 28538 Henrico, VA 23228-8538

Capio Partners PO Box 1378 Sherman, TX 75091-1378

Cjw Medical Center Resurgent Capital Services PO Box 1927 Greenville, SC 29602-1927

Credit Collection Services Two Wells Avenue Dept. 9136 Newton Center, MA 02459-3225

(p) FOCUSED RECOVERY SOLUTIONS 9701 METROPOLITAN COURT STE B RICHMOND VA 23236-3690

Hillcrest Davidson & A 850 N Dorothy Dr Ste 512 Richardson, TX 75081-2794

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346

Millennia Collections 78 Marion Beavers Road Ste B Sharpsburg, GA 30277-6911

Pmab Srvc 4135 S Stream Blvd Ste 4 Charlotte, NC 28217-4523 Case 15-31131-KRH Doc 63 Filed 06/18/20 Entered 06/18/20 16:56:18
Pulmonary Associates of Rich. 100 Boulders Parkway Suite 102 Richmond, VA 23225-0000

Quant Boccometic as a sprage 7 of 7 Comenity Bank PO Box 788 Kirkland, WA 98083-0788

Desc Main Quest Diagnostics PO Box 71303 Philadelphia, PA 19176-1303

Stern & Associates 415 N Edgeworth St Ste 2 Greensboro, NC 27401-2071

Transworld Systems P.O. Box 1864 Santa Rosa, CA 95402-1864 Verizon 500 Technology Dr Ste 550 Weldon Spring, MO 63304-2225

(p) VIRGINIA DEPARTMENT OF TAXATION P O BOX 2156 RICHMOND VA 23218-2156

Virginia Urosurgical Center 9105 Stony Point Drive Richmond, VA 23235-1979

Vivint Technologies Accounts Receivable Technologi 371 Hoes Ln Suite 300B Piscataway, NJ 08854-4143

Delphine Green Wilkerson 370 Azalea Avenue Richmond, VA 23227-3620

James E. Kane Kane & Papa, PC 1313 East Cary Street P.O. Box 508 Richmond, VA 23218-0508 Suzanne E. Wade P.O. Box 1780 Richmond, VA 23218-1780

Theodore Bunyen Wilkerson Jr 370 Azalea Avenue Richmond, VA 23227-3620

> The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Flagstar Bank, FSB 5151 Corporate Drive MS S-110-3 Troy, MI 48098

Focus Recovery Solutions Attn: Bankruptcy 9701 Metropolitan Court Ste B Richmond, VA 23236-0000

Horizon Financial Management 9980 Georgia Street Crown Point, IN 46307-0000

Internal Revenue Service Kansas City, MO 64999-0002 Virginia Dept. of Taxation Post Office Box 1115 Richmond, VA 23218-1115

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Flagstar Bank, FSB

End of Label Matrix Mailable recipients 42 Bypassed recipients 1 Total 43